### UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

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In re : Chapter 9

CITY OF DETROIT, MICHIGAN, : Case No. 13-53846

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Debtor. : Hon. Steven W. Rhodes

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## OBJECTION OF DEBTOR TO MOTION OF CREDITORS TO VIEW OR, IN THE ALTERNATIVE, UNSEAL SUPPLEMENTAL ORDER REGARDING MEDIATION [DOCKET NO. 5358]

The City of Detroit (the "City"), as the debtor in the above-captioned case, hereby asserts this objection (this "Objection") to the Motion of Creditors to View or, in the Alternative, Unseal Supplemental Order Regarding Mediation Confidentiality (Docket No. 5358) (the "Motion") filed by Syncora Guarantee, Inc., Syncora Capital Assurance Inc., Financial Guaranty Insurance Company and Hypothekenbank Frankfurt AG, Hypothekenbank Frankfurt International S.A., Erste Europäische Pfandbrief- und Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A. (collectively, the "Movants"). In support of this Objection, the City respectfully represents as follows:

### **Objection**

- 1. On July 12, 2014, the Court entered the Supplemental Order Regarding Mediation Confidentiality (Docket No. 5294) (the "Supplemental Order"), which was filed under seal.
- 2. Because the Supplemental Order was filed under seal, the City cannot describe or reveal its contents. Nevertheless, if the Supplemental Order affected the Movants, the City believes that the Movants would have been served with a copy of the Supplemental Order.
- 3. The City believes that that the Supplemental Order should remain confidential and sealed.
  - 4. The City therefore requests that the Motion be denied.
- 5. If the Court directs, the City can provide additional information in support of this Objection.

#### Respectfully submitted,

Dated: July 1, 2014

#### /s/ Heather Lennox

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#### ATTORNEYS FOR THE CITY

# **CERTIFICATE OF SERVICE**

I, Heather Lennox, hereby certify that the foregoing Objection of Debtor to
Motion of Creditors to View or, in the Alternative, Unseal Supplemental Order
Regarding Mediation Confidentiality [Docket No. 5358], was filed and served via
the Court's electronic case filing and noticing system on this 1st day of July, 2014.

/s/Heather Lennox